

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: LOWER MANHATTAN DISASTER SITE
LITIGATION

-----X 07CV4465(AKH)
CIRILO ENCALADA AND MELVA ENCALADA,

Plaintiffs,

- against -

ANSWER TO
AMENDED
COMPLAINT

100 WALL STREET COMPANY LLC,
2 BROADWAY LLC,
222 BROADWAY LLC,
233 BROADWAY OWNERS, LLC,
41 MADISON LP/RUDIN MANAGEMENT CO.,
ALAN KASMAN DBA KASCO,
ANN TAYLOR STORES CORPORATION,
BCRE,
BANKERS TRUST COMPANY,
BATTERY PARK CITY AUTHORITY,
BLACKMON-MOORING-STEAMATIC CATASTROPHE,
INC. D/B/A BMS CAT, BOARD OF MANAGERS OF THE
HUDSON VIEW EAST CONDOMINIUM,
BROOKFIELD FININCIAL PROPERTIES, INC.,
BROOKFIELD FININCIAL PROPERTIES, LP,
BROOKFIELD PARTNERS, LP,
BROOKFIELD PROPERTIES CORPORATION, BROOKFIELD
PROPERTIES HOLDINGS INC.,
BT PRIVATE CLIENTS CORP.
COLLIERS ABR INC.,
DEUTSCHE BANK TRUST COMPANY,
DEUTSCHE BANK TRUST COMPANY AMERICAS,
DEUTSCHE BANK TRUST CORPORATION,
EL-KAM REALTY CO.,
ENVIROTECH CLEAN AIR, INC.,
GPS ENVIRONMENTAL
CONSULTANTS, INC., HILLMAN ENVIRONENTAL
GROUP, LLC., HUDSON VIEW EAST CONDOMINIUM,
HUDSON VIEW TOWERS ASSOCIATES,
INDOOR ENVIRONMENTAL TECHNOLOGY, INC.,
KASCO RESTORATION SERVICES CO.,
MANUFACTURERS HANOVER TRUST COMPANY,

MERRILL LYNCH & CO, INC.,
NOMURA HOLDING AMERICA, INC., NOMURA
SECURITIES INTERNATIONAL, INC., ONE WALL
STREET HOLDINGS, LLC., RY MANAGEMENT CO.,
INC., RECKSON CONSTRUCTION GROUP NEW
YORK, INC., RY MANAGEMENT, SABINE ZERARKA,
STRUCTURE TONE (UK), INC., STRUCTURE TONE
GLOBAL SERVICES, INC., THE BANK OF NEW YORK
COMPANY, INC., TISHMAN INTERIORS CORPORATION,
TISHMAN SPEYER PROPERTIES,
TOSCORP INC.,
TULLY CONSTRUCTION CO., INC.,
TULLY INDUSTRIES INC,
V CUCUNIELLO,
VERIZON COMMUNICATIONS, INC., VERIZON NEW YORK, INC,
VERIZON PROPERTIES, INC.,
WARWICK & COMPANY,
WESTON SOLUTIONS, INC., WFP TOWER
B CO. G.P. CORP. WFP TOWER B HOLDING
CO., LP, WFP TOWER B. CO., L.P., WFP TOWER D CO.
G.P. CORP., WFP TOWER D HOLDING CO. I L.P.,
WFP TOWER D HOLDING CO. II L.P., WFP TOWER D
HOLDING I G.P. CORP., AND WFP TOWER D. CO., L.P., ET AL

Defendants.

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PLEASE TAKE NOTICE that defendant Envirotech Clean Air Inc.
("Envirotech"), as and for their responses to the allegations set forth in the Amended
Complaint by Adoption ("Check-off Complaint") related to the Master Complaint filed in
the above-referenced action, hereby adopts Envirotech's Answer to the Master Complaint
dated August 3, 2007, which was filed in the matter of *In re World Trade Center Lower
Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant Envirotech demands judgment dismissing the above-captioned action as against each of them, together with costs and disbursements.

Dated: Lake Success, New York
March 13, 2008

Yours, etc.

FRIEDMAN, HARFENIST, LANGER & KRAUT
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BY: 
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